

1 STEPHANIE M. HINDS (CABN 154284)
United States Attorney
2 MICHELLE LO (NYRN 4325163)
Chief, Civil Division
3 ELIZABETH KURLAN (CABN 255869)
Assistant United States Attorneys

4 450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102-3495
Telephone: (415) 436-7298
6 FAX: (415) 436-6748
Elizabeth.Kurlan@usdoj.gov

7 Attorneys for Defendants

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 DUYEN TRAN THAO PHAM,

4:22-cv-02914 DMR

13 Plaintiff,

14 v.

**STIPULATION TO EXTEND TIME WITHIN
WHICH DEFENDANTS MUST FILE A
RESPONSE AND ORDER**

15 UNITED STATES DEPARTMENT OF
16 STATE, *et al.*,

17 Defendants.

18 Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys
19 of record, hereby stipulate to a 30-day extension of time within which the Defendants must serve the
20 answer or otherwise respond in the above-entitled action. Defendants will file their response on or
21 before August 31, 2022.

22 The parties further request a corresponding extension on the deadline for filing a summary
23 judgment motion under the Court's Immigration Mandamus Procedural Order. Currently, if Plaintiff
24 has not filed a motion for summary judgment by 90 days after the Complaint was filed, or August 15,
25 2022, Defendants must file a motion for summary judgment by 120 days after the Complaint was
26 served, or September 28, 2022. In light of the agreed-upon extension for Defendants' response to the
27 Complaint, the parties request that, if Plaintiff has not filed a motion for summary judgment by
28

Stip to Extend Time
4:22-cv-02914 DMR

1 September 30, 2022, Defendants must file their motion for summary judgment by October 31, 2022. In
2 accordance with Civil Local Rule 5(i)(3), the filer of this document attests that all signatories listed
3 herein concur in the filing of this document.

4 Dated: July 29, 2022

Respectfully submitted,

5 STEPHANIE M. HINDS
United States Attorney

7 */s/ Elizabeth D. Kurlan*
ELIZABETH D. KURLAN
8 Assistant United States Attorney
9 Attorneys for Defendants

10 Dated: July 29, 2022

11 */s/ Christina Sullivan*
CHRISTINA SULLIVAN
12 Attorney for Plaintiff

13 **ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED. Defendants' response to the Complaint is due by
15 August 31, 2022, and Defendants must file its motion for summary judgment by October 31, 2022.

16 Date: August 1, 2022

